

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SKANGA ENERGY & MARINE LIMITED,

Plaintiff,

v.

AREVENCA S.A., PETRÓLEOS DE
VENEZUELA S.A., and JAVIER GONZALEZ
ALVAREZ

Defendants.

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Case 1:11-cv-04296-DLC
ECF CASE

NOTICE OF MOTION
FOR STAY OF PROCEEDINGS
PENDING APPEAL

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, Defendant Petróleos de Venezuela S.A. (“PDVSA”) will move this Court, before the Hon. Denise L. Cote, United States District Judge, for an order staying proceedings against it pending PDVSA’s appeal from this Court’s Opinion and Order of June 21, 2012 to the United States Court of Appeals for the Second Circuit.

Respectfully submitted,

By: /s/ Lawrence H. Martin

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Venezuela S.A.*

Dated: July 27, 2011

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Notice of Motion for Stay of Proceedings Pending Appeal and Defendant Petróleos de Venezuela S.A.'s Memorandum of Law in support thereof were served electronically by the Court's ECF system, and by first class mail on those parties not registered for ECF pursuant to the rules of this court.

Dated: July 27, 2012

/s/ Lawrence H. Martin
Lawrence H. Martin